

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**LEON WEINGRAD, individually and on  
behalf of all others similarly situated,**

**Plaintiff,**

**v.**

**IBAN GLOBAL LLC**

**and**

**LIVEFREE EMERGENCY RESPONSE,  
INC. D/B/A LIFE BEACON**

**Defendants.**

**Case No. 24-4212**

**DECLARATION OF SHANTALL TREJO**

1. My name is Shantall Trejo and I am over the age of 18 years old. All matters testified to are based upon my own knowledge and understanding.

2. I am employed as a Customer Service Agent in the customer service department of LiveFree Emergency Response, Inc.

3. On July 14 I received a telephone call from a person named Leon Weingrad. LiveFree has a recording of the telephone call.

4. On the call, the person (falsely, I later learned) told me that he had "just got [his] LifeBeacon in the mail," and was "a little bit confused" and that he "just wanted to make sure he had the right customer service."

5. He claimed that the paperwork said "IBAN" but also Livefree Emergency Response and asked if it was "all the same company."

6. Because he seemed to be trying to make sure he was calling the correct customer service line, I agreed with him that it was "all the same company." For customer service

purposes, that is true. I am aware that we at LiveFree provides customer service help to IBAN clients.

7. The truth is, that I do not know the corporate structure of LiveFree Emergency Response, Inc., or IBAN, or their relationship, and at the time I made that statement, I did not think I was being asked a question about the anything except whether the person calling had reached the right customer service number.

8. No one at LiveFree has ever told me that IBAN and LiveFree are the same company. I do not believe they are the same company. At the time I agreed they were all the same company I was referring to the customer service aspects and not to anything else because I do not have any knowledge of LiveFree's corporate structure.

EXECUTED this 21<sup>st</sup> day of July, 2025

Signed by:

*Shantall Trejo*

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Shantall Trejo